

5/2/06 Item 7  
SSORP  
deadline: 4/24/06

April 21, 2006

**Subject: Proposed Statewide General Waste Discharge Requirements for Sewage Collection System Agencies**

As we commented on prior drafts, there is an ambiguity in the proposed WDR with regard to its applicability to combined sewer systems. The City of Sacramento, along with the City and County of San Francisco, has a combined system in the older part of the City. Since combined systems include storm drainage in the same pipe network, these systems function differently than separate sewer systems; in fact, Congress has addressed combined systems specifically in the Clean Water Act. The City of Sacramento has an NPDES permit for its combined system and is actively improving it to reduce its susceptibility to outflows and flooding.

To clarify that the statewide WDR does not apply to combined sewer systems, we propose that you revise Finding 1 as follows (change shown in bold):

1. All federal and state agencies, municipalities, counties, districts, and other public entities that own or operate **separate** sanitary sewer systems greater than one mile in length that collect and/or convey untreated or partially treated wastewater to a publicly-owned treatment facility in the State of California are required to comply with the terms of this Order. Such entities are hereinafter referred to as <sup>3</sup>Enrollees<sup>2</sup>. **Municipal combined storm and sanitary sewer systems will continue to be regulated under individual permits consistent with Section 402(q)(1) of the federal Clean Water Act.**

Thank you for the opportunity to comment.

Sincerely,

Gary A Reents, Director

